

December 21, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, DC 20554

*Re: Response to Request for Supplemental Comments
EB Docket No. 01-66*

Dear Ms. Salas:

The Wireless Communications Association International, Inc. ("WCA"), by its counsel, wishes to express its support for the October 24, 2001 joint *ex parte* submission filed in the above-referenced proceeding by the National Cable & Telecommunications Association, Telecommunications for the Deaf, Inc. and National Association for the Deaf ("NCTA/NAD"), in which NCTA/NAD requests that the Commission permit small cable systems (*i.e.*, those with fewer than 5,000 subscribers) to comply with their Emergency Alert System ("EAS") audio and video messaging requirements by using a decoder only, rather than an encoder and decoder as currently required by Section 11.11(a) of the Commission's rules. Assuming that the Commission would extend such a policy to small wireless cable systems, WCA believes that the NCTA/NAD proposal could produce material cost savings for smaller operators without undermining their EAS compliance efforts or the value of the EAS service to the public. Although wireless cable operators now have unprecedented opportunities to utilize MDS/ITFS spectrum for non-video services, smaller wireless cable systems have been and continue to be the only *bona fide* competition to incumbent cable and/or DBS service in their respective markets. Any Commission action that minimizes the financial burden of EAS compliance (assuming no corresponding harm to public safety) will serve the public interest by enhancing the ability of smaller wireless cable systems to deliver competitive multichannel video service to their customers. Accordingly, WCA urges the Commission to adopt the NCTA/NAD proposal in advance of the October 1, 2002 EAS compliance deadline for smaller wireless cable systems.

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Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,

/s/
Robert D. Primosch
Counsel for The Wireless Communications
Association International, Inc.

cc: Daniel Brenner
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